

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NINH C. MAI,

Plaintiff,

VS.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No. 3:22-cv-07344-LJC

STIPULATION AND ORDER FOR AN EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 30-day extension of time, from February 24, 2023 to March 27, 2023, for Defendant to respond to Plaintiff's Complaint (Dkt. No. 1).

This is Defendant's first request for an extension of time and good cause exists for this extension. In accordance with 42 U.S.C. § 405(g), the Commissioner files a certified copy of the transcript of the administrative record, including the evidence upon which the findings and decisions complained of are based. Our office has been informed by the client agency, which is

1 the Social Security Administration, Office of Appellate Operations, that the transcript is not yet
2 ready. The client agency therefore needs more time to prepare an administrative record for the
3 Court's review. We need to wait for the transcript to make sure that the record provided to the
4 Court and to Plaintiff is complete and accurate.

5 Defendant's counsel will endeavor to complete these tasks as soon as possible. This
6 request is made in good faith and with no intention to unduly delay the proceedings, and counsel
7 apologizes for any inconvenience.

8 Plaintiff does not oppose Defendant's request for an extension of time.

9 Respectfully submitted,

10 Dated: February 22, 2023

11 /s/ Harvey P. Sacket
12 (*as authorized via email on 2/22/23)
Attorney for Plaintiff

13 Dated: February 22, 2023


14 STEPHANIE M. HINDS
United States Attorney

15 By: /s/ Erin Highland
16 ERIN HIGHLAND
17 Special Assistant U.S. Attorney
18 Attorneys for Defendant

19 ORDER

20 Pursuant to stipulation, IT IS SO ORDERED.
21

22 Dated: February 22, 2023

23 
24 THE HONORABLE LISA J. CISNEROS
25 United States Magistrate Judge
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